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March 24, 2015

#### Via ECF

The Honorable Denise L. Cote United States District Court for the Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, New York 10007

#### Re: Request to File Under Seal

NCUA v. RBS Securities Inc., No. 13-cv-6726 (S.D.N.Y.) NCUA v. RBS Securities Inc., No. 11-cv-5887 (C.D. Cal.) NCUA v. RBS Securities Inc., No. 11-cv-2649 (D. Kan.) NCUA v. Morgan Stanley, No. 13-cv-6705 (S.D.N.Y.)

#### Dear Judge Cote:

RBS filed today RBS's Letter Motion to Compel Regarding U.S. Central Discovery in the above-captioned matters. Exhibits 4 and 19 to that letter motion were designated Confidential by Plaintiff pursuant to the Master Protective Order (ECF No. 102) entered in these matters. Exhibit 23 was designated Confidential by Defendant RBS. A list of Exhibits 4, 19 and 23 is attached hereto. Paragraph 9 of the Master Protective Order provides:

In the event that before trial in the Related Actions, or in connection with any hearing in or any matter relating to the Related Actions, counsel for any Party determines to file or submit in writing to the Clerk's office any Protected Material, or any papers containing or making reference to the substance of such material or information, such documents or portions thereof containing or making reference to such material or information shall be filed with a request that the documents be filed under seal in accordance with the rules of the Court, and kept under seal until further order of the Court.

In accordance with Rule 4(A) of the Court's Individual Practices in Civil Cases, and Paragraph 9 of the Master Protective Order, RBS requests that Exhibits 4, 19 and 23 to its letter motion be filed under seal in accordance with the rules of Court, and kept under seal until further order of the Court.

# KIRKLAND & ELLIS LLP

Very truly yours,

/s/ R. Alexander Pilmer

R. Alexander Pilmer

cc: Counsel of Record (via ECF)

# KIRKLAND & ELLIS LLP

### **Documents Requested To Be Filed Under Seal**

Exhibit 4	Comparison of Greenwich Representations and Warranties To Navy Representations and Warranties
	NCUA-USC-0010069753
Exhibit 19	J. Barbera Email (7/27/2005)
	NCUA-USC-0010070160
Exhibit 23	HVMLT 2007-4 Loan Tape
	RBS-NCUALA-00000034